

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ZHIHAN WANG,

Plaintiff,

v.

PDD HOLDINGS, INC., a Cayman Islands corporation, WHALECO, INC., a Delaware corporation, and DOES 1-10,

Defendants.

CASE NO. 1:23-cv-04760

Hon. Mary M. Rowland

**DEFENDANT PDD HOLDINGS, INC.’S OPPOSED MOTION TO DISMISS
PLAINTIFF’S COMPLAINT AND DEFENDANTS’ OPPOSED MOTION TO DISMISS
PLAINTIFF’S CLAIM FOR STATUTORY DAMAGES AND ATTORNEYS’ FEES**

Defendant PDD Holdings, Inc. (“PDD”), pursuant to Federal Rule of Civil Procedure 12(b)(2), moves to dismiss the Complaint (Dkt. No. 1) of Plaintiff Zhihan Wang (“Plaintiff” or “Wang”) for lack of personal jurisdiction, and PDD and Defendant WhaleCo, Inc. (“WhaleCo”) (collectively, “Defendants”), pursuant to Federal Rule of Civil Procedure 12(b)(6), move to dismiss Plaintiff’s prayer for statutory damages and attorneys’ fees. The basis for the motion and support therefore is provided in the accompanying Memorandum, filed concurrently.

Counsel for Defendants met and conferred with counsel for Plaintiff on September 25, 2023, and counsel for Plaintiff advised that Plaintiff opposes the motion.

Dated: September 25, 2023

/s/ Garret A. Leach

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